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July 3, 2025

Hon. Gina L. Simms United States Magistrate Judge United States District Court, District of Maryland 6500 Cherrywood Lane, Suite 245 Greenbelt, MD 20770

RE: Bray v. Rhythm Management Group, LLC, et al. Case No. 8:23-cv-03142-TDC

Dear Judge Simms:

This firm represents Defendants in the above-referenced action. We write to you regarding Plaintiff's Notice of Intent to File a Motion to Compel Discovery (ECF No. 78). This Court ordered Defendants to file a response by July 7, 2025.

The parties held a meet and confer today. The parties are currently working through the matters raised in Plaintiff's letter and believe they can resolve all outstanding issues without the need for a discovery dispute hearing before the Court.

The parties ask that, if any outstanding issues remain unresolved by July 28, 2025, that they reserve the right to revisit and raise these issues to the Court, and Defendants ask for the opportunity to provide a formal, substantive response if any issues remain unresolved at that time.

We have shared this letter with Plaintiff's counsel before filing, and Plaintiff's counsel concurs.

Very truly yours,

Hans P. Riede